



Little Traverse Bay Bands of Odawa Indians  
Natural Resource Department  
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December 2, 2015

Michigan Department of Natural Resources  
ATTN: Hannah Guyer/Executive Office  
525 West Allegan St.  
P.O. Box 30028  
Lansing, MI 48909-7528  
[DNR-Net-Pen-Comments@michigan.gov](mailto:DNR-Net-Pen-Comments@michigan.gov)

Subject: Net Pen Aquaculture

Dear Ms. Guyer,

The Little Traverse Bay Bands of Odawa Indians Natural Resource Department (LTBB NRD) appreciates the opportunity to provide comments on the State of Michigan's review of the aspects of commercial net-pen aquaculture. As a Sovereign Nation and co-manager of our shared natural resources with the State, LTBB NRD would like to express that we are opposed to allowing commercial net-pen aquaculture on the Great Lakes. LTBB's concerns include the risk of water quality deterioration, disease, increased contaminants, and escaped farmed fish.

LTBB was federally reaffirmed on Sept. 21, 1994 with the signing of Public Law 103-324. LTBB's boundaries lie in the area reserved in the 1855 Treaty of Detroit encompassing the north-western part of Michigan's Lower Peninsula. LTBB has 110 miles of Great Lakes Shoreline, 394 miles of creeks, rivers, and streams, 27,553 acres of lakes, and 35,647 acres of wetlands. Our traditional rights to hunt, fish and gather in the Ceded Territory as reserved in the 1836 Treaty of Washington and reaffirmed in the 2000 Great Lakes and 2007 Inland Consent Decrees are part of our way of life. These traditional rights in the Ceded Territory, which includes portions of Lake Superior, Lake Michigan, and Lake Huron, may be impinged upon by the allowance of commercial net-pen aquaculture.

Water quality is a concern to LTBB as the concentration of fish in net-pens will increase the amount of nutrients in a concentrated area. An excess of nutrients in an area may contribute to vegetation and algal blooms, perhaps leading to toxic Harmful Algal Blooms (HABs).

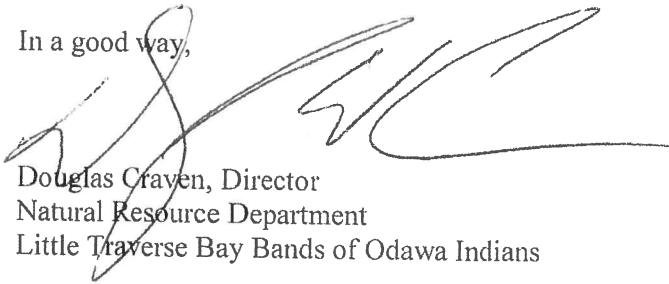
Diseases that are naturally found in the ecosystem could be amplified by the close-quarters and large numbers of fish in a net-pen. Any escaped fish could infect natural fish populations.

Contaminants in fish food are an unavoidable reality in aquaculture. LTBB is against putting additional contaminants in the Great Lakes through fish food or any other vector.

Allowing commercial net-pen aquaculture would benefit a limited number of individual entities, at the expense of the environment and tribal and non-tribal citizens alike. For LTBB, the risk to the fishery and our Treaty Reserved Rights is too great to allow commercial net-pen aquaculture. Commercial net-pens do not coincide with LTBB's prerogative to build a sustainable

environment and fishery for the next seven generations. We look forward to working with the Michigan Department of Natural Resources in the future. Please contact me (231) 242-1678 if you have any questions.

In a good way,

A handwritten signature in dark ink, appearing to read 'D. Craven', with a large, sweeping flourish extending to the right.

Douglas Craven, Director  
Natural Resource Department  
Little Traverse Bay Bands of Odawa Indians